REMARKS/ARGUMENTS

This Amendment is in response to the Office Action mailed August 28, 2006. Claims 1-24 were pending in the present application. This Amendment amends claims 1 and 5, and cancels claims 4 and 21-24, leaving pending in the application claims 1-3 and 5-20. Reconsideration of the rejected claims is respectfully requested.

I. Restriction of the Claims.

The claims are subjected to restriction under 35 U.S.C. §121 as being drawn to groups classified as:

Group I: Claims 1-20, as being drawn to accessing database objects in an integration server system; and

Group II: Claims 21-24, as being drawn to determining sequence attribute values of data objects in a database schema for database manipulations.

Although Applicants do not necessarily agree with these groupings and/or the need for restriction, Applicants hereby elect to prosecute the claims of Group I without traverse (as also set forth in the communication of August 3, 2006). Applicants reserve the right to present the non-elected claims in subsequent continuing applications. Applicants hereby cancel the claims of Group II, and request consideration and examination of the claims of Group I (claims 1-20).

II. Objection to the Claims

Claim 14 is objected to as reciting the term "arc," which is allegedly not defined and described in the specification. Applicants respectfully submit that the term "arc" is sufficiently described in paragraph [0049] and the exemplary algorithm of Table 2, and as such respectfully request that the objection to the claim be withdrawn.

III. Rejection under §101

Claims 1-20 are rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. It is respectfully submitted that claim 1 as amended recites an "integration server system" including a "model application programming interface adapted to provide a client application with access to the set of data object instances" and a "metadata application programming interface adapted to provide a client application with access to the set of data object instances via the metadata model", whereby "the client application and any additional application are able to concurrently alter the ordered association using different random values for different object instances". It is respectfully submitted that this system includes components allowing applications to alter the ordered association of data object instances, and as such recites statutory subject matter. The other pending claims depend from this claim and also recite statutory subject matter for at least the same reasons. Applicants therefore respectfully request that the rejection with respect to claims 1-20 be withdrawn.

IV. Rejection under 35 U.S.C. §102

Claims 1, 2, and 3 are rejected under 35 U.S.C. §102(b) as being anticipated by *Mullins* (US Patent No. 5,857,197). Applicants respectfully submit that *Mullins* does not disclose each element of these claims.

For example, Applicants' claim 1 as recites an integration server system, comprising:

> a database schema configured to store a set of data object instances;
>
> a metadata model representing a configuration of the set of data object instances in the database schema;
>
> a model application programming interface adapted to provide a client application with access to the set of data object instances; and
>
> a metadata application programming interface adapted to provide a client application with access to the set of data object instances via the metadata model,
>
> wherein **the database schema includes a sequence attribute adapted to preserve an ordered association between the set of data object instances, such that an intermediate sequence attribute instance has a random value between a pair of values of a pair of adjacent sequence attribute instances, whereby the client application and any additional application are able to concurrently alter the ordered association using different random values for different data object instances**

(*emphasis added*). Such limitations are not disclosed by *Mullins*. *Mullins* discloses accessing a data store having data store content and a data store schema as objects from an object application (col. 2, line 66-col. 3, line 7). *Mullins* does not, however, disclose a database schema including an intermediate sequence attribute instance having a random value between a pair of values of a pair of adjacent sequence attribute instances, whereby the client application and any additional application are able to concurrently alter the ordered association using different random values for different object instances, as required by Applicants' claim 1. As such, *Mullins* cannot anticipate Applicants' claim 1 or the claims that depend therefrom.

Claims 1, 2, 3, 16, 17, and 18 are rejected under 35 U.S.C. §102(e) as being anticipated by *Trappen* (US Publication No. 2004/0015814). The Office Action specifically states on page 10 that *Trappen* does not disclose the limitation "the database schema includes a sequence attribute adapted to preserve an ordered association between the set of data object instances, such that an intermediate sequence attribute instance has a random value between a pair of values of a pair of adjacent sequence attribute instances," such that *Trappen* cannot anticipate Applicants' claim 1 as amended or the claims that depend therefrom.

Applicants therefore respectfully request that the anticipation rejections with respect to claims 1, 2, 3, 16, and 17 be withdrawn.

V. Rejection under 35 U.S.C. §103

Claim 4 is rejected under 35 U.S.C. §103(a) as being rendered obvious by *Trappen* in view of *Komine* (US 6,728,727) and *Brickmore* (US 2003/0206170). Claim 4 has been canceled from the application, such that the rejection of claim 4 is moot. The limitations of claim 4 have been added with other limitations to be recited in Applicants' claim 1, such that the scope of claim 1 as amended is different from the scope of previously pending claim 4.

Claim 5 is rejected under 35 U.S.C. §103(a) as being rendered obvious by *Trappen* in view of *Komine* and *Brickmore* and further in view of *Burges* (US 2003/0236787). Claim 5 as amended depends from claim 1, which is not rendered obvious by the combination of *Trappen*, *Komine*, and *Brickmore* as these references fail to teach or suggest, individually or in combination, "a database schema including an intermediate sequence attribute instance having a random value between a pair of values of a pair of adjacent sequence attribute instances," which also provides that "a client application and any additional application are able to concurrently alter the ordered association using different random values for different object instances." *Burges* teaches automated database matching (paragraph [0007]), and is cited as teaching a floating point value (OA p. 12). Such teaching does not, however, make up for the above-referenced deficiencies in *Trappen*, *Komine*, and *Brickmore* with respect to claims 1 or 5, such that *Burges* cannot render these claims obvious, alone or in any combination with these references.

Claims 6 and 7 are rejected under 35 U.S.C. §103(a) as being rendered obvious by *Trappen* in view of *O'Leary* (US 2001/0050675). Claims 6 and 7 depend from claim 1, which is not rendered obvious by *Trappen* as discussed above. *O'Leary* does not make up for the deficiencies in *Trappen* with respect to Applicants' claim 1, as *O'Leary* fails to teach or suggest "a database schema including an intermediate sequence attribute instance having a random value between a pair of values of a pair of adjacent sequence attribute instances," which also provides that "a client application and any additional application are able to concurrently alter the ordered association using different random values for different object instances." As such, *O'Leary* cannot render obvious Applicants' claim 1 or dependent claims 6 and 7, either alone or in combination with *Trappen*.

Claims 8, 9, and 20 are rejected under 35 U.S.C. §103(a) as being rendered obvious by *Trappen* and *O'Leary* in view of *Oba* (US 5,303,147). Claims 8, 9, and 20 depend from claim 1, which is not rendered obvious by *Trappen* and *O'Leary* as discussed above. *Oba* does not make up for the deficiencies in *Trappen* and *O'Leary* with respect to Applicants' claim 1, as *Oba* fails to teach or suggest "a database schema including an intermediate sequence attribute instance having a random value between a pair of values of a pair of adjacent sequence attribute instances," which also provides that "a client application and any additional application are able to concurrently alter the ordered association using different random values for different object instances." As such, *Oba* cannot render obvious Applicants' claim 1 or dependent claims 8, 9, and 20, either alone or in any combination with *Trappen* and *O'Leary*.

Claims 10, 15, and 19 are rejected under 35 U.S.C. §103(a) as being rendered obvious by *Trappen* in view of *George* (US 6,996,566). Claims 10, 15, and 19 depend from claim 1, which is not rendered obvious by *Trappen* as discussed above. *George* does not make up for the deficiencies in *Trappen* with respect to Applicants' claim 1, as *George* fails to teach or suggest "a database schema including an intermediate sequence attribute instance having a random value between a pair of values of a pair of adjacent sequence attribute instances," which also provides that "a client application and any additional application are able to concurrently alter the ordered association using different random values for different object instances." As such, *George* cannot render obvious Applicants' claim 1 or dependent claims 10, 15, and 19, either alone or in combination with *Trappen*.

Claims 11 and 12 are rejected under 35 U.S.C. §103(a) as being rendered obvious by *Trappen* and *George* in view of *Wetherbee* (US 5,937,409). Claims 11 and 12 depend from claim 1, which is not rendered obvious by *Trappen* and *George* as discussed above. *Wetherbee* does not make up for the deficiencies in *Trappen* and *George* with respect to Applicants' claim 1, as *Wetherbee* fails to teach or suggest "a database schema including an intermediate sequence attribute instance having a random value between a pair of values of a pair of adjacent sequence attribute instances," which also provides that "a client application and any additional application are able to concurrently alter the ordered association using different random values for different object instances." As such, *Wetherbee* cannot render obvious Applicants' claim 1 or dependent claims 11 and 12, either alone or in any combination with *Trappen* and *George*.

Claim 13 is rejected under 35 U.S.C. §103(a) as being rendered obvious by *Trappen* and *George* in view of *Mather* (US 2005/0055363). Claim 14 is rejected under 35 U.S.C. §103(a) as being rendered obvious by *Trappen* and *George* in view of *Horn* (US 5,226,158). Claims 13 and 14 depend from claim 1, which is not rendered obvious by *Trappen* and *George* as discussed above. Neither *Mather* nor *Horn* make up for the deficiencies in *Trappen* and *George* with respect to Applicants' claim 1, as *Mather* and *Horn* each fail to teach or suggest "a database schema including an intermediate sequence attribute instance having a random value between a pair of values of a pair of adjacent sequence attribute instances," which also provides that "a client application and any additional application are able to concurrently alter the ordered association using different random values for different object instances." As such, neither *Mather* nor *Horn* can render obvious Applicants' claim 1 or dependent claims 13 and 14, either alone or in any combination with *Trappen* and *George*.

Applicants therefore respectfully request that the obviousness rejections with respect to these claims be withdrawn.

VI. Amendment to the Claims

Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,

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